

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

LIBERTY LEGAL FOUNDATION;
JOHN DUMMETT;
LEONARD VOLODARSKY;
CREG MARONEY,

Plaintiffs

CASE NO: 2:12-cv-02143-cgc

v.

NATIONAL DEMOCRATIC PARTY
of the USA, Inc.;
DEMOCRATIC NATIONAL
COMMITTEE;
TENNESSEE DEMOCRATIC PARTY;
DEBBIE WASSERMAN SCHULTZ;
CHIP FORRESTER,

On Notice of Removal of Case
No. CH-11-1757-3 from Chancery
Court for the State of Tennessee in
Shelby County

Defendants

PLAINTIFFS' MOTION FOR EXTENSION OF TIME

Pursuant to Rule 7 of the Federal Rules of Civil Procedure, the Plaintiffs respectfully move this Court for an extension of time to file responses to Defendants' motions to dismiss, pending this Court's ruling on Plaintiffs' motion to remand the above-named case to the Chancery Court for the State of Tennessee in Shelby County.

Grounds for this motion, as set forth more fully in the accompanying memorandum of law, are that Plaintiffs' should not be required to respond to

multiple motions to dismiss when this Court is likely to remand this case to state court.

Respectfully submitted this 14th Day of March, 2012, by:

s/Van R. Irion
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CERTIFICATE REGARDING CONSULTATION

Pursuant to this Court's Local Rule 7.2(a)(1)(B), counsel for the Plaintiffs hereby certifies that upon consultation with opposing counsel, accord could not be reached regarding the instant motion. Said consultation was made with attorneys Ben Gastel and Gerard Stranch via e-mail on March 5 and 6, 2012.

s/Van R. Irion
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CERTIFICATE OF SERVICE

It is hereby certified that on March 14, 2012, a copy of "Plaintiffs' Motion for Extension of Time" was filed electronically. A copy of this motion will be served upon the Defendants through the Court's electronic filing system.

s/Van R. Irion
Van R. Irion